

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARAT GOKHBERG, YURY GOKHBERG,
DAVID JAFFE, SUREKHA BASSI, AND MARC
FRANCHI,

PLAINTIFFS,

v.

THE PNC FINANCIAL SERVICES GROUP, INC.
AND PNC BANK, N.A.,

DEFENDANTS.

Case No.: 1:15-cv-06001-LTS

Document Filed Electronically

DECLARATION OF JUDITH HAAS

My name is Judith Haas, and I am over 18 years of age and fully competent to make this declaration. I give this declaration of my own free will and all of the statements contained are true and correct based upon my personal knowledge, and if called as a witness, I could and would competently testify to them.

1. I am employed with PNC Bank, National Association (“PNC”) as VP, Senior Employee Relations Investigator in Pittsburgh, Pennsylvania. I have worked in this position since July of 2011.

2. Based on my job duties, I have access to information regarding the employment of all Mortgage Loan Officers (“MLOs”) employed by PNC within the past three years. MLOs work in a number of different PNC branches nationwide and are responsible for originating mortgage loans.

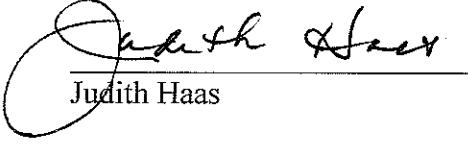
3. PNC currently employs over 800 MLOs nationwide. Over the last three years, PNC has employed approximately 2,300 MLOs. Of that total, 67 MLOs have worked in New York. Of the 67 in New York, 17 have worked in PNC's New York City and West Harrison branches. The remaining MLOs in New York worked in PNC's Bayside, Melville, or Garden City locations. PNC does not have a "headquarters" in New York.

4. PNC's headquarters is located in Pittsburgh, Pennsylvania. PNC's human resources operations group, compensation department, and employee relations department are based in Pittsburgh. This is also where most of PNC's senior management employees in these departments are employed.

5. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that all of the forgoing statements are true and correct.

Executed this 11th day of September, 2015 in

Pittsburgh, PA.



Judith Haas